

The Honorable Thomas S. Zilly

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

ANDREW HEDDEN, et al.,

NO. C05-0999 TSZ

Plaintiffs,

NOTICE OF DEPOSITION AND  
SUBPOENA DUCES TECUM TO  
JOHN BUCKNER, M.D.

v.

CITY OF SEATTLE, et al.,

Defendants.

To: JOHN BUCKNER, M.D.  
c/o Paul Richmond  
Law Office of Paul Richmond  
600 First Avenue, Suite 331  
Seattle, WA 98104

YOU ARE HEREBY COMMANDED to be and appear at the offices of STAFFORD  
FREY COOPER, 3100 Two Union Square, 601 Union Street, Seattle, Washington 98101  
on Wednesday, December 20, 2006, at 9:00 a.m., then and there to give testimony upon  
oral examination at the request of the defendants in the above-entitled cause, and to  
remain in attendance upon the undersigned or other Notary Public until discharged.

YOU ARE FURTHER COMMANDED to bring with you at said time and place the  
following documents or tangible things:

NOTICE OF DEPOSITION AND SUBPOENA DUCES  
TECUM TO JOHN BUCKNER, M.D. - 1

C05-0999 TSZ  
3019-027230 121162

**STAFFORD FREY COOPER**

PROFESSIONAL CORPORATION

601 Union Street, Suite 3100

Seattle WA 98101.1374

TEL 206.623.9900 FAX 206.624.6885

1. All diaries, documents, e-mails, and written notes that reflect your *observations* of the demonstration events.<sup>1</sup>
2. All photographs, audio recordings, video recordings, or other media taken by you of the demonstration events.
3. A copy of the flyers you handed out during the demonstration.
4. All evidence gathered at the scene of the demonstration, including but not limited to physical evidence of "non-lethal" weaponry.
5. All documents, materials, and/or written communications exchanged between you and the plaintiffs or other demonstrators before and during the demonstration.
6. All documents related to the permitting process for the demonstration.

**HEREIN FAIL NOT AT YOUR PERIL.**

DATED this 13th day of December, 2006.

STAFFORD FREY COOPER

By: /s/ Ted Buck via ECF

Ted Buck, WSBA #22029  
Krista S. Mirhoseini, WSBA #22134  
Darrin E. Bailey, WSBA #34955  
Attorneys for Defendant City of Seattle  
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601 Union Street, Suite 3100  
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[DBailey@StaffordFrey.com](mailto:DBailey@StaffordFrey.com)

<sup>1</sup> Demonstration refers to the demonstration that occurred in Seattle, Washington on June 2, 2003, as referenced in your Complaint.

NOTICE OF DEPOSITION AND SUBPOENA DUCES  
TECUM TO JOHN BUCKNER, M.D. - 2

C05-0999 TSZ  
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Certificate of Service

I certify that on the date noted below I electronically filed this document entitled Notice of Deposition and Subpoena Duces Tecum to JOHN BUCKNER, M.D. with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following persons:

Paul Richmond  
Law Office of Paul Richmond  
600 First Avenue, Suite 331  
Seattle, WA 98104  
(206) 382-6275  
FAX: (206) 382-4941  
*Attorneys for Plaintiffs*

DATED this 13<sup>th</sup> day of December, 2006, at Seattle, Washington.

STAFFORD FREY COOPER

By: /s/ Ted Buck via ECF  
Ted Buck, WSBA #22029  
Attorneys for Defendant  
Stafford Frey Cooper  
601 Union Street, Suite 3100  
Seattle, WA 98101-1374  
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NOTICE OF DEPOSITION AND SUBPOENA DUCES  
TECUM TO JOHN BUCKNER, M.D. - 3

C05-0999 TSZ  
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